



VIA: <https://www.fs.usda.gov/project/ochoco/?project=61651>

October 28, 2024

Shane Jeffries, Forest Supervisor  
Ochoco National Forest  
3160 NE Third Street  
Prineville, OR 97754

RE: North Fork Crooked River Forest Resilience Project Objection

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the North Fork Crooked River Forest Resilience Project (NFCR). Scott McFarland, District Ranger is the responsible official. The NFCR project occurs on the Paulina District on the Ochoco National Forest.

**Objector**

American Forest Resource Council  
700 NE Multnomah, Suite 320  
Portland, Oregon 97232  
(503) 222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, Nevada, and California. AFRC represents over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. The NFCR project will, if properly implemented, benefit AFRC's members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

## **Objector's Designated Representative**

Irene Jerome, AFRC Consultant

408 SE Hillcrest Rd

John Day, OR 97845

541-620-4466

[ijerome@amforest.org](mailto:ijerome@amforest.org)

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the Draft EA which are hereby incorporated by reference.

**When compared to the Proposed Alternative, Alternative 2 Modified (Alt 2M) fails to adequately meet the Purpose and Need of the Project and incorporation of any of its elements would retard the agency's ability to meet those objectives to their fullest extent.**

The Purpose & Need as it appears in the Final EA includes the following:

*“There is a need to improve forest resilience of the planning area to disturbance events such as insect and disease outbreaks, drought and wildfire; to create vegetation conditions needed to attain riparian management objectives; to promote adaptation to climate change; and a need to improve habitat security for big game.”*

In AFRC's opinion, the goal of any Forest Service vegetation management project should be to meet the stated project objectives to the maximum extent across as many acres of the project area as possible. The scope, measured in acres treated for this project, should be the metric that indicates how well the Forest Service is meeting its stated objectives on any given project. In other words, meeting the stated Purpose & Need on 500 acres is inferior to meeting the stated Purpose & Need on 600 acres.

In our Draft EA comments, we expressed support for Alternative 2 which proposed a variety of resource treatments on 37,577 acres and encompasses the Lower North Fork Crooked River and Paulina Creek watersheds including 7,282 acres of commercial thinning that would produce merchantable timber for AFRC members. Our Draft EA comments stated that: *the consideration of every stand where treatment is appropriate, regardless of its land allocation, is important to our membership as each year's timber sale program is a function of the treatment of aggregate forested stands across the landscape.* This concern over maximizing treatment acres applies not just to our membership's needs but also to the full attainment of the stated Purpose & Need as referenced above. Any reduction in acres will inhibit the attainment of the project objectives.

AFRC recognizes that the eastern side of the project area within the Paulina Creek Watershed has been affected by the Crazy Creek Fire and that fire suppression activities are still ongoing.

However, this is the ideal opportunity to address “changed conditions” after fire suppression is completed and the BAER analysis occurs.

AFRC **does not support** limiting tree cutting to trees less than 21” DBH for all species and dropping commercial thinning from Category 1-3 RHCAs. The Draft Decision Notice does not provide a substantive explanation for the deferral of treatment in those RHCAs other than that it was based on “public comments in opposition to commercial treatment in RHCAs.” We would like the Forest Service to expand on which components of those comments compelled the Forest Service to sacrifice attainment of the purpose and need by their ultimate deferral. The NEPA process is designed to provide decision-makers with the best available information in order to enable well-informed decisions. We would like to better understand what that information was and how it informed this decision.

Furthermore, the Ochoco Forest Restoration Collaborative (OFRC) has zones of agreement for treatments in RHCAs and has achieved successes with this agreement east of the NFCR on the Wolf project. AFRC objects to this blatant disregard for the agreements that OFRC has achieved.

Ultimately, we believe that full implementation of the acres in the Draft Decision Notice while taking into consideration results from the BAER report when it’s complete, is the only way to best meet the Purpose and Need and to maximize its attainment, particularly the portion of the Purpose and Need that addresses the need for age-class diversity, long-term wood products, and stream restoration and that any incorporation of elements of the other alternative would retard this attainment.

### **Resolution Requested**

AFRC requests that the Deciding Official implement Alternative 2 as described in the final EA to the fullest extent possible after the BAER analysis is complete. This includes cutting young grand fir trees greater than 21” DBH as necessary for stand restoration and implementing commercial thinning in Category 1-3 RHCAs. We also request that the Deciding Official expand on the public comments in opposition to RHCA management and how that opposition informed the draft decision and how that decision improves attainment of the purpose and need. AFRC requests that OFRC be engaged to provide input on restoration measures when fire suppression activities have ended, and the BAER analysis completed. We believe that implementation of the deferred units east of Indian Creek through a subsequent Decision Notice may be option at a later date.

## **Request for Resolution Meeting**

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Irene Jerome, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,



Travis Joseph  
President